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Cooperative Power Association

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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MAIL BRANCH

June 9, 1992

Ms. Donna R. Searcy, Secretary
Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Re: ET Docket No. 92-9
Redevelopment of Spectrum to Encourage Innovation in the Use of New
Telecommunications Technologies

Dear Ms. Searcy:

Cooperative Power hereby respectfully submits its comments on the above-referenced docket because we recognize the importance of well managed spectrum for current and future users.

Cooperative Power is a non-profit, consumer-owned generation and transmission cooperative that supplies wholesale electric power to 17 member electric distribution cooperatives in west central and southern Minnesota. The area served includes 48 of Minnesota's 87 counties, with power provided at retail to more than 185,000 meters serving approximately 550,000 consumers.

While Cooperative Power's headquarters and its 17 member systems are located in Minnesota, Cooperative Power is the majority owner and operator of a 1,100 megawatt coal-fired power plant, Coal Creek Station, which is located in central North Dakota.

Telecommunications plays a vital role in Cooperative Power's ability to provide economical and reliable power to its members and the consumers they serve. It is essential that a highly reliable communications system be maintained to interconnect substations, member cooperatives, power plants, and control centers.

The proposed reallocation of 220 MHz of the 1850-2200 MHz band would adversely affect Cooperative Power's operations. Cooperative Power presently owns and operates a 2 GHz microwave system comprised of 20 tower sites. The system represents a multi-million dollar investment and is used for a variety of functions:

- o Reporting metering data every 15 minutes from 250 substations to manage electric load.

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Together in a changing world

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- o Carrying load management signals to consumer loads.
- o Providing computer data exchange between Coal creek Station and Cooperative Power headquarters (a distance of 45 miles).
- o Providing communications coverage for a mobile radio system throughout Cooperative Power's service area.
- o Providing communications between Cooperative Power and its 17 member systems, such as computer links, E-mail, voice OPX circuits, etc.

The proposed reallocation would require Cooperative Power to move to a higher frequency, such as the 6 GHz band, at an estimated cost of \$10 million. Cooperative Power has also considered the use of technologies such as fiber optics, satellite or common carrier as a replacement for loss of our portion of the 1850-2200 MHz band, but this is not considered a viable alternative to microwave because of cost and reliability problems.

In view of the above, Cooperative Power recommends that utilities be allowed to keep their existing microwave systems. If a portion of the 1850-2200 MHz band is selected for reallocation to new and emerging technologies, then we urge the FCC to refrain from clearing the band in rural and remote areas served by point-to-point microwave systems operated by Cooperative Power and other rural electric cooperative systems. Since emerging technology is going to be, essentially, an urban/suburban phenomenon, the 1850-2200 MHz band should remain available for existing users in rural areas on a permanent co-primary basis. In addition, we urge that the FCC require emerging technologies to reimburse the existing microwave user for the cost of relocation.

Cooperative Power does not understand the wisdom of exempting government frequencies from reallocation simply because they are not currently under the control of the FCC. If there is spectrum available in this area, why should it be any less available for reallocation than the spectrum used by utilities?

We also feel that it is discriminatory to allow public safety users to remain co-primary, while we drop to secondary status.

In conclusion, we emphasize that Cooperative Power is firmly opposed to reallocation of 22 MHz of the 1850-2200 MHz band for emerging technologies. The 1850-2200 MHz band is providing an invaluable and irreplaceable service for electric utilities, railroads, oil and gas pipelines, and public safety agencies. The loss of this spectrum to new and emerging technologies would be very detrimental to Cooperative Power and over half a million consumers who depend on us for an economical and reliable supply of electricity. Such a loss would not be in the public interest.

If the commission proceeds to reallocate a portion of this spectrum, we strongly feel that:

- o Government frequencies not currently governed by the FCC should be brought into play.
- o Utilities, as well as government agencies, should be granted permanent co-primary status.

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- o Utilities should not be required to shift to fiber optics because that technology is very expensive and is not amenable to multiple drops in a small geographical area.
- o New users should have the burden of demonstrating that the new technology will not interfere with existing users.

Thank you for your consideration of our views.

Sincerely,

COOPERATIVE POWER



Vernon O. Carlson
Acting General Manager

Enclosures

JCW:VOC:lmr:AG0

cc: Bob Bergland, NRECA
Charles M. Meehan, UTC